

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,)	CR. 11-40111
)	
Plaintiff,)	
)	
vs.)	MOTION FOR LATER
)	MOTION DEADLINE DATE
RONALD GOLDBERG,)	
)	
Defendant.)	

The Defendant, Ronald Goldberg, by and through his attorney of record, Patrick M. Schroeder, moves this Court for an Order allowing him to file motions by Wednesday, March 11, 2015.

Defense Counsel has been reviewing a large volume of discovery material, including discs that contain phone calls allegedly made by the Defendant along with numerous emails allegedly sent and received by the Defendant.

Defense Counsel has been unable to listen to all the phone calls or open all the emails. Defense counsel has been working with the United States Attorney's office and the Internal Revenue case officer to assist in reviewing this information, but hasn't been able to review all the material yet. Defense Counsel is also waiting for information from the private investigator.

It's possible this information could be relevant to motions for severance or venue.

WHEREFORE, the Defendant respectfully requests he be given until the 11th of March to file motions on behalf of the Defendant.

Respectfully submitted this 4th day of March, 2015.

BRENDE SCHROEDER MEADORS LLP

/s/ Patrick M. Schroeder
Patrick M. Schroeder
Attorney for Defendant
110 N. Phillips Ave.
Sioux Falls, SD 57104
(605) 333-0070
Pat@bsmlp.com

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of March, 2015, I served upon the following Assistant U.S. Attorney Connie Larson by electronic filing at connie.larson@usdoj.gov a true and correct copy of the foregoing Motion for Later Motion Deadline Date and this Certificate of Service.

/s/ Patrick M. Schroeder
Patrick M. Schroeder